

To: Matson, John[matson.john@epa.gov]
From: Cohen, Eric
Sent: Fri 5/1/2015 2:31:48 PM
Subject: RE: USG Walworth SO2 Permit Limit

If 5.5 lbs./mmbtu results in 844 tpy then we may have a federally enforceable limit on potential. On variable is heat input, any limits in the permit for that? Does 5.5 translate to 844 tpy?

From: Matson, John
Sent: Thursday, April 30, 2015 3:53 PM
To: Cohen, Eric
Subject: USG Walworth SO2 Permit Limit

Eric-

As we discussed today, the facility's SO² permit limit for the Cupola is 5.5 lbs./mmbtu (i.e. 182.66 lbs./hr), and an actual SO² annual emissions limit of 844.4 tons/yr.

You asked whether its federally enforceable. NR 417.07(2)(b) of the Wisconsin SIP limits SO² emissions to 5.5 lbs./mmbtu at coal-fired units with combined coal-firing capacity of less than 250 mmbtu/hr. NR 417.07(2)(b) of the Wisconsin SIP applies to the Walworth facility, therefore the limit is federally enforceable because it binds the facility to comply with the 5.5 lbs./mmbtu SO²

Emissions limit in NR 417.07(2)(b) of the Wisconsin SIP.

I'll look at the Minnesota facility next, but I would appreciate your thoughts on this.

Thanks.

John